

## S.H. Bell Summary of Enforcement Actions

(updated by Shilpa Patel on May 15, 2013)

Ohio EPA Actions		U.S. EPA Actions
PAST ACTIONS		
2001 2008	<u>Apr 2008</u> : Ohio EPA issued Findings and Orders	<u>Feb 2001</u> : U.S. EPA Inspection <u>Apr 2008</u> : CD entered <ul style="list-style-type: none"> <li>• Ceased all crushing of nonmetallic minerals</li> <li>• SEPs: Installed baghouse on truck loadout shed and paved surrounding area (~15,000 ft<sup>2</sup>)</li> </ul>
2010	<u>Feb 2010</u> : Ohio EPA issued Findings and Orders <u>Nov 2010</u> : All requirements of Ohio Findings and Orders were implemented <ul style="list-style-type: none"> <li>• Ceased handling, processing, and storage of manganese materials at Little England Facility</li> <li>• Installed baghouses or wet suppression systems on major emission units</li> <li>• Storage of all manganese materials within fully enclosed buildings</li> <li>• Fugitive emissions controlled through various dust suppression methods, vehicular tarping, and opacity limits</li> </ul>	
2011	<u>Jul 2011</u> : Ohio EPA Inspection	<u>Aug 17-Dec 5, 2011</u> : Xact Monitoring Period
2012	<u>Jul 2012</u> : Ohio EPA Inspection; S.H. Bell paved all remaining unpaved roads	
2013	<u>Jan 2013</u> : Email from Paul Koval indicated no further actions will be taken.	<u>May 8, 2013</u> : 114 issued <ul style="list-style-type: none"> <li>• Compare high/low manganese emission days found through Xact monitoring to process operations run the same days/times to determine specific processes that are causing high manganese emissions</li> </ul>
FUTURE ACTIONS		
2013		<u>Summer 2013</u> : U.S. EPA inspection <ul style="list-style-type: none"> <li>• S.H. Bell emission control methods will be challenged during the dry/hot season</li> <li>• Will be focused on processes identified through above comparison and fugitive emission sources</li> </ul>